

## LEVIN-EPSTEIN &amp; ASSOCIATES, P.C.

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April 26, 2023

**VIA ECF**

The Honorable Colleen McMahon, U.S.D.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

USDC SDNY
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Re: *Nieves et al v. Vanderleigh Properties, LLC et al*  
**Case No.: 1:22-cv-10581-CM**

Dear Honorable Judge McMahon:

This law firm represents Plaintiff Eduardo Nieves (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule I(D), this letter respectfully serves to request permission to convert the in-person case management conference scheduled for May 4, 2023 at 11:15 a.m., to a virtual conference.

This is the first request of its nature, and is made on consent of counsel for Defendants Vanderleigh Properties, LLC, 7 of 8 Realty Co. LLC, Jayden 65 Co. LLC, Loquitis 80 Co. LLC, Praxis Realty Co. LLC, Robert Moses, Henry Moses, Jr., and Kelvin Trevino (collectively, the “Defendant”).

The basis for this request is that the undersigned will be traveling overseas from April 21, 2023 to, through and including the afterhours of May 2, 2023, and will have extremely limited availability from May 2, 2023 to, through and including May 8, 2023. A second, independent basis also necessitates the instant request. The undersigned law firm has a conflicting, status conference mediation on May 4, 2023 in a pending action in the Eastern District of Michigan, captioned *BSD Management LLC v. Rozen et al.*, Case No.: 4:22-cv-11763-FKB-EAS.

In light of the foregoing, it is respectfully requested that the in-person case management conference scheduled for May 4, 2023 at 11:15 a.m., be converted to a virtual conference.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi, Esq.

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Attorneys for Plaintiff

Conference adjourned  
to 5/18/2023 at 11:45 a.m.

*Colleen McMahon*  
4/27/2023

VIA ECF: All Counsel

MEMO ENDORSED